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ATTORNEYS FOR PLAINTIFFS

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 CHINA CENTRAL TELEVISION, a China  
13 company; CHINA INTERNATIONAL  
14 COMMUNICATIONS CO., LTD., a China  
15 company; TVB HOLDINGS (USA), INC., a  
16 California corporation; and DISH  
17 NETWORK L.L.C., a Colorado corporation,  
18 Plaintiffs,

19 vs.

20 CREATE NEW TECHNOLOGY (HK)  
21 LIMITED, a Hong Kong company; HUA  
22 YANG INTERNATIONAL TECHNOLOGY  
23 LIMITED, a Hong Kong company;  
24 SHENZHEN GREATVISION NETWORK  
25 TECHNOLOGY CO. LTD., a China  
26 company; CLUB TVPAD, INC., a California  
27 corporation; BENNETT WONG, an  
individual, ASHA MEDIA GROUP INC.  
d/b/a TVPAD.COM, a Florida corporation;  
AMIT BHALLA, an individual;  
NEWTVPAD LTD. COMPANY d/b/a  
NEWTVPAD.COM a/k/a TVPAD USA, a  
Texas corporation; LIANGZHONG ZHOU,  
an individual; HONGHUI CHEN d/b/a E-  
DIGITAL, an individual; JOHN DOE 1 d/b/a  
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
JOHN DOE 5 d/b/a GANG YUE; JOHN  
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
d/b/a GANG TAI WU XIA; and JOHN DOES  
8-10,

28 Defendants.

) Case No.  
**CV 15-1869 SVW (AJWx)**

) **DECLARATION OF SEAN M.**  
**SULLIVAN IN SUPPORT OF**  
**PLAINTIFFS' RECOVERY OF**  
**ATTORNEYS' FEES AND**  
**COSTS PURSUANT TO**  
**COURT'S ORDER DATED**  
**DECEMBER 1, 2017 DOCKET**  
**NUMBER 222**

Courtroom: 10A

Judge: Hon. Stephen V.  
Wilson

## DECLARATION OF SEAN M. SULLIVAN

I, Sean M. Sullivan, declare as follows:

1. I am an attorney admitted to practice before all the courts of the State of California and before this Court. I am a partner in the law firm of Davis Wright Tremaine LLP (“DWT”), and one of the attorneys of record for Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively, “Plaintiffs”) in this matter. I have personal knowledge of the matters herein.

2. In compliance with the Court’s Order dated December 1, 2017, I submit this declaration and **Exhibit 1** itemizing the attorneys’ fees and costs incurred by Plaintiffs in making the motion to hold non-compliant Internet Service Providers in contempt (“Motion for Contempt”).

3. DWT is a national law firm of more than 550 lawyers. The firm is recognized nationally for, among other things, its intellectual property litigation, First Amendment, and communications law practices.

4. The litigation in this case has been handled primarily by DWT partner Robert D. Balin as lead counsel; partners Lacy H. Koonce III and myself; and associates George P. Wukoson and Jamie S. Raghu. The following chart reflects the billing rates DWT charged in this matter for each attorney (third column), as well their standard 2017 billing rates (last column):

<b>Name</b>	<b>Title</b>	<b>Reduced Hourly Rate</b>	<b>2017 Standard Billing Rate</b>
Robert D. Balin	Partner	\$616.50	\$695.00
Lacy H. Koonce III	Partner	\$522.00	\$605.00
Sean M. Sullivan	Partner	\$468.00	\$550.00
George P. Wukoson	Associate	\$450.00	\$525.00
Jamie S. Raghu	Associate	\$396.00	\$465.00

1       5. Mr. Balin has more than 30 years of experience in media, First  
 2 Amendment, and intellectual property litigation. Among other honors, he has been  
 3 consistently named as one of “America’s Leading Lawyers” in First Amendment  
 4 Litigation by Chambers USA, one of the “Best Lawyers in America” in Media Law  
 5 by Woodward/White, and selected to “New York Super Lawyers” by Thomas  
 6 Reuters. Mr. Balin also teaches Media Law as a lecturer in law at Columbia Law  
 7 School in New York. His agreed-upon discounted hourly billing rate for this matter  
 8 of \$616.50 is significantly lower than his 2017 standard rate of \$695.00.

9       6. Mr. Koonce has more than 20 years of experience in media, technology,  
 10 and intellectual property litigation. Mr. Koonce frequently writes and speaks on  
 11 intellectual property and technology issues. He is also the co-chair of the Law and  
 12 Technology Committee of the New York County Lawyers Association. His agreed-  
 13 upon discounted hourly billing rate for this matter of \$522 is significantly lower than  
 14 his 2017 standard rate of \$605.

15       7. Mr. Wukoson is a former DWT associate who worked on intellectual  
 16 property matters while employed at DWT. Prior to working at DWT, Mr. Wukoson  
 17 was an associate at the law firm Dechert LLP. Mr. Wukoson is now Senior  
 18 Corporate Counsel at Ziff Davis. His agreed-upon discounted hourly billing rate for  
 19 this matter of \$450 is significantly lower than his 2017 standard rate of \$525.

20       8. Ms. Raghu is an associate who works on media and intellectual property  
 21 matters at DWT. Prior to joining DWT, Ms. Raghu was previously an associate at  
 22 the law firm Simpson Thacher & Bartlett LLP and clerked for the Honorable  
 23 Edgardo Ramos in the United States District Court for the Southern District of New  
 24 York. Her agreed-upon discounted hourly billing rate for this matter of \$396 is  
 25 significantly lower than her 2017 standard rate of \$465.

26       9. I have 14 years of litigation experience focusing on intellectual property  
 27 and privacy matters. I am based in Los Angeles and am a member of the California  
 28 bar. I was previously selected to be included in “Southern California Rising Stars”

1 for intellectual property litigation by Thomas Reuters. My agreed-upon discounted  
 2 hourly billing rate for this matter, \$468.00, is significantly lower than my 2017  
 3 standard rate of \$550.00.

4 10. Attached as **Exhibit 1** is a true and correct copy of invoices containing  
 5 the daily time entries from each DWT timekeeper with descriptions of the work  
 6 performed by each professional on each day.<sup>1</sup> **Exhibit 1** also contains true and  
 7 correct copies of invoices of Plaintiffs' investigator for work related to the Motion  
 8 for Contempt. These invoices have been redacted to remove entries for which  
 9 Plaintiffs do not seek recovery, and to protect privileged or confidential information.  
 10 In addition, the first page of **Exhibit 1** is a chart that summarizes the total amount of  
 11 time spent by each professional and costs incurred through November 2017.

12 11. As reflected in the chart and invoices included in **Exhibit 1**, through  
 13 November 2017, Mr. Balin spent approximately 20 hours formulating Plaintiffs'  
 14 strategy for enforcing the permanent injunction against non-compliant Internet  
 15 Service Providers; reviewing and editing the Motion for Contempt, the supporting  
 16 declarations and exhibits, and proposed Order, among other tasks. Mr. Koonce spent  
 17 approximately 1 hour formulating the strategy for enforcing the permanent injunction  
 18 against non-compliant Internet Service Providers. Mr. Wukoson spent approximately  
 19 27 hours strategizing and preparing the Motion for Contempt, the supporting  
 20 declarations, and proposed Order, among other tasks. Ms. Raghu spent  
 21 approximately 23 hours preparing the Motion for Contempt, the supporting  
 22 declarations, and proposed Order, among other tasks. I spent approximately 10 hours  
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24 <sup>1</sup> Attached as **Exhibit 1** are the invoices that DWT sent to each of our three clients  
 25 (China Central Television/China International Communications Co., Ltd., TVB  
 26 Holdings (USA), Inc., and DISH Network L.L.C.) in connection with DWT's work  
 27 drafting the Motion for Contempt. As reflected in the invoices, each of the clients  
 28 was charged a percentage portion of DWT's fees, with the percentages adding up to  
 100%. In other words, the total amount of the attached invoices equals the total  
 charges for DWT's work on the Motion for Contempt.

1 assisting in strategizing and preparing the Motion for Contempt, the supporting  
2 declarations, and proposed Order, among other tasks.

3 12. As reflected in **Exhibit 1**, to date Plaintiffs have incurred \$38,577.60 in  
4 fees and \$8,710.00 in costs associated with making the Motion for Contempt.

5 I declare under penalty of perjury under the laws of the United States of  
6 America that the foregoing is true and correct.

7 Executed this 15th day of December, 2017 in Los Angeles, California.

8  
9 /s/ Sean M. Sullivan  
10 Sean M. Sullivan  
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## PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, 865 South Figueroa Street, Suite 2400, Los Angeles, California 90017-2566.

On December 15, 2017, I served the foregoing document(s) described as:

**DECLARATION OF SEAN M. SULLIVAN IN SUPPORT OF  
PLAINTIFFS' RECOVERY OF ATTORNEYS' FEES AND COSTS  
PURSUANT TO COURT'S ORDER DATED DECEMBER 1, 2017,  
DOCKET NUMBER 222**

on the interested parties in this action as stated below:

9  (BY ELECTRONIC MAIL) I caused such documents to be transmitted via  
10 electronic mail to the offices of the addressee(s) at the listed electronic mail  
address(es).

Azure Technology Co., Ltd./  
Cloud DDOS Technology Co., Limited

abuse@azure-tech.com  
ts@azure-tech.com  
terry@azure-tech.com  
gdxnfx@gmail.com

ClearDDoS Technologies  
cs@clear-ddos.com  
support@clear-ddos.com

ZERO DDOS LLC  
ZERO DDOS LLC  
  
colin@zeroddos.com  
herotm@gmail.com

Executed on December 15, 2017, at Los Angeles, California.

Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Dee Keegan  
Print Name

Dee Keegan  
Signature